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6 *Attorneys for Defendants*  
7 *Top Shelf Golf, LLC, Top Shelf IT Solutions, Inc, Ivan Sokolovich and Inna Sokolovich*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 MOTOGOLF.COM, LLC, a Nevada limited-  
liability company;

11 Plaintiff,

12 vs.

13 TOP SHELF GOLF, LLC, a Maine limited  
14 liability company; TOP SHELF IT  
15 SOLUTIONS, INC., a Maine corporation;  
16 IVAN SOKOLOVICH, an individual; INNA  
17 SOKOLOVICH, an individual; KEVIN P.  
MURPHY, an individual; KEVIN E.  
MURPHY, an individual; ALIAKSANDR  
SHAVIALEVICH, an individual;

18 Defendants.  
19

Case No. 2:20-cv-00674-APG-EJY

**STIPULATION AND ORDER EXTENDING  
DEFENDANTS' TIME TO RESPOND TO  
FIRST AMENDED COMPLAINT**

**(FIRST REQUEST)**

20 Plaintiff, MOTOGOLF.COM, LLC, by and through their counsel, Steven A. Gibson,  
21 Esq. and Roman Nihman, Esq. of Gibson Lexbury LLP ("Plaintiff"), and Defendants TOP  
22 SHELF GOLF, LLC, TOP SHELF IT SOLUTIONS, INC., IVAN SOKOLOVICH and INNA  
23 SOKOLOVICH ("Defendants"), by and through their counsel, John D. Tennert, Esq. and Wade  
24 Beavers, Esq. of Fennemore Craig, P.C. request that the Court enter an order, pursuant to Local  
25 Rule IA 6-1, extending the deadline for Defendants to file a response to Plaintiff's First  
26 Amended Complaint [ECF No. 71] and providing a reciprocal extension of time for Plaintiff to  
27 file a response to any motion filed in lieu of an answer to the First Amended Complaint.

1 The current deadline, April 29, 2021, has not expired. The parties seek an extension of  
2 time for Defendants to file a response to the First Amended Complaint through **May 7, 2021**.  
3 The parties further request that, in the event Defendants file a motion in lieu of an answer to the  
4 First Amended Complaint, the time for Plaintiff to respond thereto under this Court's LR 7-2(b)  
5 be extended by a reciprocal eight (8) days.

6 This is the parties' first request to extend the deadline for filing a response to the First  
7 Amended Complaint and is not made for any deleterious purposes or to unnecessarily delay these  
8 proceedings. Rather, the parties seek this extension in good faith for the benefit of Defendants  
9 and their counsel.

10 Therefore, the parties stipulate and agree to extend the deadline for filing a response to  
11 the First Amended Complaint until May 7, 2021, and further stipulate and agree that eight (8)  
12 days be added to the time under LR 7-2(b) for Plaintiff to file a response to any motion in lieu of  
13 an answer. The parties request the Court enter an order reflecting the same.

14 DATED this 28<sup>th</sup> day of April, 2021.

DATED this 28<sup>th</sup> day of April, 2021.

15 **FENNEMORE CRAIG, P.C.**

**GIBSON LEXBURY LLP**

16 By: /s/ Wade Beavers

By: /s/ Roman Nikhman

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27 *Top Shelf IT Solutions, Inc, Ivan Sokolovich*  
28 *and Inna Sokolovich*

*Attorneys for Plaintiff Motogolf.com, LLC*

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

Dated: April 28, 2021